

9 June 2015

Mr Geoffrey Gleeson
Director Operations 1
Anti-Dumping Commission
Level 35, 55 Collins Street
Melbourne Victoria 3000

Email: operations1@adcommission.gov.au

Dear Mr Gleeson

Public File

Re: Revocation Review Inquiry No. 288 – Preserved mushrooms exported from the People's Republic of China

Introduction

I refer to ADN No. 2015/52 notifying the commencement of a revocation review inquiry in respect of preserved mushrooms exported from the People's Republic of China ("China"). The application for the revocation review was made by Global Procurement Pty Ltd ("GlobalCo") and alleges that the anti-dumping measures are no longer "warranted" as the sole Australian manufacturer, Windsor Farm Foods Pty Ltd ("WFF") has ceased the manufacture of preserved mushrooms in Australia.

It is also claimed by GlobalCo that "*extensive research into Australia's food processing industry has also failed to show or indicate that any other party or entity produces like goods in Australia*".

The statement that no manufacture of like goods continues in Australia is incorrect.

Local manufacture

Following WFF's cessation of production in 2011 Simplot Australia Pty Ltd ("Simplot") commenced the manufacture of preserved mushrooms at its Bathurst factory in November 2011. Simplot is a local food processor with an annual turnover of approximately \$1.5 Billion. Simplot has incorporated the manufacture of preserved mushrooms within its food processing capabilities, and continues to market the goods under the Edgell brand in Australia (replacing WFF as the local producer). In October 2014 Simplot relocated production of preserved mushrooms to its Echuca, Victoria factory and continues to manufacture preserved mushrooms under the Edgell brand name.

As an Australian manufacturer of a broad range of processed foods including preserved mushrooms, Simplot does not consider that grounds exist for the revocation of the anti-dumping measures applicable to exports of preserved mushrooms from China. The removal of the anti-dumping measures will likely lead to a recurrence of material injury to the Australian industry that the measures are intended to prevent.

Simplot has included its last twelve months of its locally produced cost-to-make-and-sell ("CTM&S") data for the like goods manufactured at Echuca. The CTM&S data has been prepared in accordance with the Anti-Dumping Commission's ("the Commission") pro-forma Appendix A6.1 format. The data relates to the twelve months from 1 May 2014 to 30 April 2015.

Please refer to Simplot's Confidential CTM&S data attached at Confidential Attachment 1.



Revocation Review

GlobalCo's application relates solely to the revocation of the anti-dumping measures on the grounds that the local manufacture of the goods does not exist. As Simplot is a manufacturer of like goods the subject of the notice, GlobalCo's application for the revocation of the measures must fail. GlobalCo has not provided any additional information concerning a change in any of the applicable variable factors.

The Commission is invited to verify Simplot's production process and confirm the local manufacture of the like goods as covered by the anti-dumping measures.

Following the validation of Simplot's production and confirmation of an Australian industry manufacturing like goods, Simplot submits that the application for revocation of the measures must be terminated.

If you have any questions concerning this letter or the attached information, please do not hesitate to contact either Danny Mellon at Simplot on (03) 9588 3620 or Simplot's adviser, John O'Connor on (07) 3342 1921.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Danny Mellon', written in a cursive style.

Danny Mellon
General Manager – Procurement, Logistics and Planning